

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ABRAHAM BARKHORDAR, SARAH
ZELASKY, and ELLA WECHSLER-
MATTHAEI, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

HARVARD UNIVERSITY,

Defendant.

Civil Action No. 1:20-cv-10968-IT

**DECLARATION OF JENNIFER B. SOKOLER IN SUPPORT OF DEFENDANT'S
MOTION TO DISMISS THE FIRST AMENDED CONSOLIDATED COMPLAINT**

I, Jennifer B. Sokoler, declare:

1. I am an attorney at the law firm of O'Melveny & Myers LLP, attorneys of record for Defendant Harvard University ("Harvard")¹ in this matter. I am licensed to practice law in the State of New York. I was admitted *pro hac vice* in this matter. I submit this declaration in support of Defendant's Motion to Dismiss the First Amended Consolidated Complaint. The following facts are true and correct to the best of my knowledge, information, and belief.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the 2019-2020 Harvard Graduate School of Education Student Handbook.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the 2019-2020 Harvard T.H. Chan School of Public Health Student Handbook.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the 2019-2020 Harvard Law School Handbook of Academic Policies.

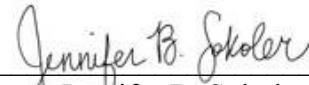
5. Attached hereto as **Exhibit 4** is a true and correct copy of Harvard University's Frequently Asked Questions website. I obtained Exhibit 4 from a March 13, 2020 archival copy of Harvard's website at <https://www.harvard.edu/coronavirus/faq>.

6. Attached hereto as **Exhibit 5** is a true and correct copy of the Harvard Law School's Fall 2020 Leave of Absence Considerations for JD Students. I obtained Exhibit 5 from Harvard Law School's website at <https://hls.harvard.edu/dept/registrar/fall-2020-leave-of-absence-considerations/>.

I declare under penalty of perjury that the foregoing is true and correct.

¹ The President and Fellows of Harvard College is the legal entity comprising Harvard University, and is the proper party to this litigation.

Executed on October 7, 2020 in New York, New York.



Jennifer B. Sokoler

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on October 7, 2020.

/s/ Anton Metlitsky
Anton Metlitsky (*pro hac vice*)